## REMARKS

This reply is in response to the Office Action dated September 11, 2009. Claims 35-47, 49, 51-53, 56, 57, and 59-66 are pending in the application and stand rejected.

Claims 35, 40, 43, 47, 49, 51-53, 57, 65, and 66 have been amended.

Claims 67 and 68 have been added.

No new matter has been presented.

Entry of the foregoing amendments and consideration of the remarks is respectfully requested.

**Specification Objections**

The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. Regarding claims 35-40, the Examiner asserts that the terms "service account," "service account identifier," and "end-user interface" are not clearly supported in the specification. Applicant has amended the claims, thus obviating the objection.

**Claim Rejections - 35 U.S.C. § 112**

Claims 35-47, 49, 51-53, 56-57, and 59-66 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Examiner asserts that specific support for an "end-user interface," "an end-user interface communicably coupled to the payment processor system," and an end-user "entering a service account identifier in addition to the intermediary account identifier" could not be found in the specification. Applicant has amended an "end-user interface" to recite a "payment account assistance module." Specific support for a "payment account assistance module" can be found in the specification, at least in paragraph 27. Applicant has amended "an end-user interface communicably coupled to the payment processor system" to recite a "payment processor system coupled to a payment account assistance module." Specific support for a "payment processor system coupled to a payment account assistance module" can be found in the specification, at least in paragraph 27. Applicant has amended "a service account identifier" and an "intermediary account identifier" to recite "an end-user account number" and "an intermediary account number," respectively. Specific support

for an end-user entering "an end-user account number" and "an intermediary account number" can be found in the specification, at least in paragraph 27.

**Claim Rejections - 35 U.S.C. § 102**

Claims 35-36, 38-42, 49, 52-53, 56-57, 59-61, 63-64, and 66 stand rejected under 35 U.S.C. § 102 as being anticipated by Dorf (U.S. Patent No. 6,000,608; hereafter *"Dorf"*). Regarding independent claim 35, the Examiner asserts that *Dorf* discloses an interface device configured to send a message to a service provider system indicating a credit to a service account identified by a service account identifier associated with an intermediary account identifier. Applicant has amended claim 35, obviating the rejection.

At the very least, *Dorf* does not teach or disclose a payment processor system configured to receive data indicative of a payment and an intermediary account number, <u>retrieve an end-user account number associated with the intermediary account number, and send data indicative of the payment and the retrieved end-user account number to a service provider system</u>, as required in claim 35 and those depending therefrom. In contrast, *Dorf* requires a processing hub configured to receive an identification number originating from a card and send the same identification number to an issuer hub. *See*, col. 7, ll. 2-5 and ll. 9-13. Indeed, Applicant's claim 35 requires a payment processor system receiving an intermediary account number and sending a retrieved end-user account number; in contrast, *Dorf* requires a processing hub receiving an identification number and sending the **same** identification number. Therefore, *Dorf* does not teach or disclose a payment processor system configured to receive data indicative of a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send data indicative of the payment and the end-user account number to a service provider system instructing the service provider system to credit an end-user account identified by the end-user account number, as required in claim 35 and those depending therefrom.

Regarding independent claim 35, the Examiner also asserts that *Dorf* discloses an end-user interface configured to receive an intermediary account identifier and a service account identifier. Applicant has amended claim 35, obviating the rejection.

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At the very least, *Dorf* does not teach or disclose a payment account assistance module configured to receive an intermediary account number **and** an end-user account number, as required in claim 35 and those depending therefrom. In contrast, *Dorf* requires a processing hub configured to receive an identification number. *See,* col.6, ll. 8-11 and col. 7, ll. 2-5. Indeed, Applicant's claim 35 requires a payment account assistance module receiving **two numbers**: an intermediary account number and an end-user account number; in contrast, *Dorf* requires a processing hub receiving only **one number**: an identification number. Therefore, *Dorf* does not teach or disclose a payment account assistance module configured to receive an intermediary account number and an end-user account number, as required in claim 35 and those depending therefrom. For at least these reasons, withdrawal of the rejection and allowance of the claims is respectfully requested.

The Examiner states that independent claims 40 and 66 have similar limitations to claim 35 and are rejected by the same art and rationale as claim 35. Applicant has amended independent claims 40 and 66, obviating the rejection.

At the very least, *Dorf* does not teach or suggest a payment interface configured to receive data related to a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send a message to a service provider instructing the service provider to credit the end-user account identified by the end-user account number, as required in claim 40 and those depending therefrom. At the very least, *Dorf* also does not teach or suggest instructions for receiving a payment and an intermediary account number, instructions for associating the intermediary account number with the end-user account number, and instructions for sending a message to a service provider indicating a credit to the end-user account identified by the end-user account number, as required in claim 66 and those depending therefrom. As stated above, *Dorf* requires a processing hub configured to receive an identification number originating from a card and send the same identification number to an issuer hub. *See,* col. 7, ll. 2-5 and ll. 9-13. However, Applicant's claims 40 and 66 require receiving an intermediary account number and sending an end-user account number; in contrast, *Dorf* requires receiving an identification number and sending the **same** identification number. Therefore, *Dorf* does not contain each and every element in claims

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40 and 66. Withdrawal of the rejections and allowance of claims 40 and 66 and those depending therefrom is respectfully requested.

**Claim Rejections - 35 U.S.C. § 103**

Claims 37, 43, 45-47, and 62 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Dorf* in view of Muehlberger (U.S. Patent No. 5,696,908; hereafter "*Muehlberger*"). The Examiner asserts that *Dorf* teaches each and every element of claim 37, except for a point-of-sale terminal that comprises a vending machine. The Examiner, however, asserts that *Muehlberger* teaches this element, and combines the teachings of *Dorf* and *Muehlberger* to form the basis for this rejection. Applicant has amended independent claim 35 from which claim 37 depends, obviating the rejection.

As discussed above, at the very least, *Dorf* fails to teach, show, or suggest a payment processor system configured to receive data indicative of a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send data indicative of the payment and the retrieved end-user account number to a service provider system, as recited in amended independent claim 35 and those depending therefrom. *Muehlberger* fails to cure this shortcoming of *Dorf*. Withdrawal of the rejection and allowance of claim 37 is respectfully requested.

The Examiner asserts that *Dorf* teaches each and every element of claim 46. Applicant has amended independent claim 40 from which claim 46 depends, obviating the rejection.

As discussed above, at the very least, *Dorf* fails to teach, show, or suggest a payment interface configured to receive data related to a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send a message to a service provider instructing the service provider to credit the end-user account identified by the end-user account number, as recited in amended independent claim 40 and those depending therefrom. Withdrawal of the rejection and allowance of claim 46 is respectfully requested.

The Examiner also asserts that *Dorf* teaches each and every element of claims 43, 45, 47, and 62, except for an electronic funds transfer where the collecting step is carried out via the ACH (claims 43, 45, 47) and a point-of-sale terminal comprising a vending machine (claim 62).

The Examiner, however, asserts that *Muehlberger* teaches these elements, and combines the teachings of *Dorf* and *Muehlberger* to form the basis for this rejection. Applicant has amended independent claim 40 from which claims 43, 45, 47, and 62 depend, obviating the rejection.

As discussed above, at the very least, *Dorf* fails to teach, show, or suggest a payment interface configured to receive data related to a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send a message to a service provider instructing the service provider to credit the end-user account identified by the end-user account number, as recited in amended independent claim 40 and those depending therefrom. *Muehlberger* fails to cure this shortcoming of *Dorf*. Withdrawal of the rejection and allowance of claims 43, 45, 47, and 62 is respectfully requested.

Claim 44 stands rejected under 35 USC § 103(a) as being unpatentable over *Dorf* in view of *Muehlberger* as applied to claim 43 and further in view of Risafi (U.S. Patent No. 6,473,500; hereafter "*Risafi*"). The Examiner asserts that the combination of *Dorf* and *Muehlberger* teaches each and every element of claim 44, except a transfer of an amount of money equal to a payment carried out in a batch mode on a daily basis. The Examiner, however, asserts that *Risafi* teaches this element, and combines the teachings of *Dorf*, *Muehlberger*, and *Risafi* to form the basis of this rejection. Applicant has amended independent claim 40 from which claim 44 depends, obviating the rejection.

As discussed above with respect to claims 43, 45, 47, and 62, at the very least, the combination of *Dorf* and *Muehlberger* fails to teach, show, or suggest a payment interface configured to receive data related to a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send a message to a service provider instructing the service provider to credit the end-user account identified by the end-user account number, as recited in amended independent claim 40 and those depending therefrom. *Risafi* fails to cure the shortcomings of *Dorf* and *Muehlberger*. Withdrawal of the rejection and allowance of claim 44 is respectfully requested.

Claim 51 stands rejected under 35 USC § 103(a) as being unpatentable over *Dorf* in view of Carson (U.S. Patent No. 6,028,920; hereafter "*Carson*"). The Examiner asserts that *Dorf*

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teaches each and every element of claim 51, except an account including a cellular phone account. The Examiner, however, asserts that *Carson* teaches this element, and combines the teachings of *Dorf* and *Carson* to form the basis of this rejection. Applicant has amended independent claim 40 from which claim 51 depends, obviating the rejection.

As discussed above, at the very least, *Dorf* fails to teach, show, or suggest a payment interface configured to: receive data related to a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send a message to a service provider instructing the service provider to credit the end-user account identified by the end-user account number, as recited in amended independent claim 40 and those depending therefrom. *Carson* fails to cure the shortcomings of *Dorf.* Withdrawal of the rejection and allowance of claim 51 is respectfully requested.


Claim 65 stands rejected under 35 USC § 103(a) as being unpatentable over *Dorf* in view of *Risafi.* The Examiner asserts that *Dorf* teaches each and every element of claim 65, except sending an account to an IVR system maintained by a service provider via a telecommunication system. The Examiner, however, asserts that *Risafi* teaches this element, and combines the teachings of *Dorf* and *Risafi* to form the basis of this rejection. Applicant has amended independent claim 40 from which claim 65 depends, obviating the rejection.
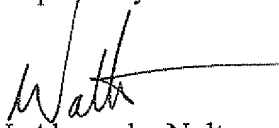
As discussed above, at the very least, *Dorf* fails to teach, show, or suggest a payment interface configured to: receive data related to a payment and an intermediary account number, retrieve an end-user account number associated with the intermediary account number, and send a message to a service provider instructing the service provider to credit the end-user account identified by the end-user account number, as recited in amended independent claim 40 and those depending therefrom. *Risafi* fails to cure the shortcomings of *Dorf.* Withdrawal of the rejection and allowance of claim 65 is respectfully requested.

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## CONCLUSION

All matters set forth in the Office Action have been addressed. Accordingly, it is believed that all claims are in condition for allowance. Favorable consideration and an early indication of allowability are respectfully requested.

Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite consideration, the Examiner is invited to call the undersigned attorney at the telephone number indicated below.
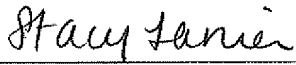
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I hereby certify that this correspondence is being filed with the U.S. Patent and Trademark Office via EFS-Web on 12/9/09

Stacy Lanier